

December 7, 2012

Mr. James R. Berlow Program Implementation and Information Division USEPA Headquarters Ariel Rios Building 1200 Pennsylvania Avenue, NW Mail Code: 5303P Washington, DC 20460

Mr. George Faison
Program Implementation and
Information Division
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Mail Code: 5303P
Washington, DC 20460

Dear Mr. Berlow and Mr. Faison:

I appreciate the time you took to meet with the executives from Entsorga to discuss their proposed project in Martinsburg, West Virginia. As stated in Entsorga's June 2011 and July 2011 letters to the U.S. Environmental Protection Agency (EPA), they strongly believe that their proposed project meets all of EPA's "Legitimacy Criteria" as outlined in 40 CFR 241(3)(d). We wanted to take this opportunity to provide additional data to supplement the existing material you have already received.

Entsorga has over 15 years of experience designing, engineering, constructing and operating facilities around the world which convert municipal solid waste (MSW) into fuel or other recycled material. Entsorga's proposed project would produce a Solid Refuse Fuel (SRF) to supplement existing fuel used for a local cement plant. The technology for this facility will use proven technology that is state of the art in its field and would help Martinsburg reduce its air emissions and landfill waste.

The attached document describes the commercial technology and equipment that would be used. It also provides several examples of Entsorga's existing Mechanical Biological Treatment (MBT) plants and how their SRF produce equivalent calorific values to traditional fuel sources, equal to or better than emissions criteria, how Entsorga treats the SRF as a valuable commodity and details the technological and engineering sophistication that would go into this facility.

Thank you for your time and consideration. If you or your staff has additional questions or concerns, please contact me.

Sincerely,

Jonathan Birdsong

Principal

BlueWater Strategies, LLC

Enclosures